

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

**CHEETAH OMNI LLC,**

Plaintiff,

v.

**ALCATEL-LUCENT USA INC.,  
ALCATEL-LUCENT HOLDINGS, INC.,  
CIENA CORPORATION, CIENA  
COMMUNICATIONS, INC., FUJITSU  
NETWORK COMMUNICATIONS, INC.,  
TELLABS, INC., TELLABS  
OPERATIONS, INC., TELLABS NORTH  
AMERICA, INC., NOKIA SIEMENS  
NETWORKS US LLC, HUAWEI  
TECHNOLOGIES USA, INC.**

Defendants.

Civil Action No. 6:11-cv-390 (LED)

**DEFENDANTS' NOTICE OF P.R. 4-2 DISCLOSURES**

Defendants Alcatel-Lucent USA Inc., Ciena Corporation, Ciena Communications, Inc., Fujitsu Network Communications, Inc., Tellabs, Inc., Tellabs Operations, Inc., Tellabs North America, Inc., Nokia Siemens Networks US LLC, and Huawei Technologies USA, Inc. hereby notify the Court that on October 18, 2012, they served on Plaintiff Cheetah Omni LLC their Preliminary Claim Constructions and Extrinsic Evidence in accordance with P.R. 4-2 and the Court's Docket Control Order as amended on June 19, 2012 Order (Dkt. 140).

Dated: October 19, 2012

Respectfully submitted,

By: /s/ Michael E. Jones

Robert F. Perry  
rperry@kslaw.com  
Alexas D. Skucas (*pro hac vice*)  
askucas@kslaw.com  
KING & SPALDING LLP  
1185 Avenue of the Americas  
New York, New York 10036  
Telephone: (212) 556-2100  
Facsimile: (212) 556-2222

Anup M. Shah (*pro hac vice*)  
ashah@kslaw.com  
KING & SPALDING LLP  
100 N. Tryon Street, Suite 3900  
Charlotte, North Carolina 28202  
Telephone: (704) 503-2559  
Facsimile: (704) 503-2622

Michael E. Jones  
State Bar No. 10929400  
mikejones@potterminton.com  
Allen F. Gardner  
State Bar No. 24043679  
allengardner@potterminton.com  
POTTER MINTON PC  
110 North College, Suite 500  
Tyler, Texas 75702  
Telephone: (903) 597-8311  
Facsimile: (903) 593-0846

ATTORNEYS FOR DEFENDANT  
NOKIA SIEMENS NETWORKS US LLC.

/s/ Noah C. Graubart, with permission by  
Michael E. Jones

Ruffin B. Cordell  
Texas Bar No. 04820550  
FISH & RICHARDSON, P.C.  
1425 K Street, N.W., Suite 1100  
Washington, D.C. 20005  
202-783-5070  
[cordell@fr.com](mailto:cordell@fr.com)

Thomas H. Reger II  
Texas Bar No. 24032992  
FISH & RICHARDSON, P.C.  
1717 Main Street, Suite 5000  
Dallas, TX 75201  
Telephone: (214) 747-5070  
[reger@fr.com](mailto:reger@fr.com)

Noah C. Graubart  
Georgia Bar No. 141862  
FISH & RICHARDSON, P.C.  
1180 Peachtree Street, NE, 21st Floor  
Atlanta, GA 30309  
Telephone: (404) 892-5002  
[graubart@fr.com](mailto:graubart@fr.com)

ATTORNEYS FOR DEFENDANT  
HUAWEI TECHNOLOGIES USA, INC.

/s/ Allison Alterson, with permission by  
Michael E. Jones

Robert Perry  
[rperry@kslaw.com](mailto:rperry@kslaw.com)  
Allison Altersohn  
[aaltersohn@kslaw.com](mailto:aaltersohn@kslaw.com)

King & Spalding LLP  
1185 Avenue of the Americas  
New York, NY 10036-4003  
Telephone: 212-556-2100  
Facsimile: (212)-556-2222

Laura S. Huffman (*pro hac vice*)  
[lhuffman@kslaw.com](mailto:lhuffman@kslaw.com)  
KING & SPALDING LLP  
1180 Peachtree Street N.E.  
Atlanta, Georgia 30309-3521  
Telephone: 404-572-4600  
Facsimile: 404-572-5100

Michael E. Jones

State Bar No. 10929400  
[mikejones@potterminton.com](mailto:mikejones@potterminton.com)  
Allen F. Gardner  
State Bar No. 24043679  
[allengardner@potterminton.com](mailto:allengardner@potterminton.com)  
POTTER MINTON PC  
110 North College, Suite 500  
Tyler, Texas 75702  
Telephone: (903) 597-8311  
Facsimile: (903) 593-0846

ATTORNEYS FOR DEFENDANT  
ALCATEL-LUCENT USA INC.

*/s/ Elizabeth L. DeRieux, with permission by  
Michael E. Jones*

Elizabeth L. DeRieux  
State Bar No. 05770585  
Capshaw DeRieux, LLP  
114 E. Commerce Ave.  
Gladewater, Texas 75647  
(903) 236-9800 Telephone  
(903) 236-8787 Facsimile  
E-mail: [ederieux@capshawlaw.com](mailto:ederieux@capshawlaw.com)

Tyler S. Brown  
Ciena Corporation  
1201 Winterson Road  
Linthicum, MD 21090  
(410) 865-8078 Telephone  
(410) 091-7305 Facsimile  
Email: [tybrown@ciena.com](mailto:tybrown@ciena.com)

Matthew J. Moore  
LATHAM & WATKINS LLP  
555 Eleventh Street, NW  
Suite 1000  
Washington, DC 20004-1304  
(202) 637-2200 Telephone  
(202) 637-2201 Facsimile  
[matthew.moore@lw.com](mailto:matthew.moore@lw.com)

ATTORNEYS FOR DEFENDANTS AND  
COUNTERCLAIMANTS CIENA  
CORPORATION AND  
CIENA COMMUNICATIONS, INC.

/s/ Christopher E. Chalsen, with permission  
by Michael E. Jones

Melvin R. Wilcox III  
State Bar No. 21454800  
YARBROUGH & WILCOX, PLLC  
100 E. Ferguson Street - Suite 1015  
Tyler, TX 75702  
Phone: 903.595.1133  
Fax: 903.595.0191  
[mrw@yw-lawfirm.com](mailto:mrw@yw-lawfirm.com)

Christopher E. Chalsen (*Pro Hac Vice*)  
[CChalsen@milbank.com](mailto:CChalsen@milbank.com)  
Lawrence T. Kass (*Pro Hac Vice*)  
[LKass@milbank.com](mailto:LKass@milbank.com)  
Milbank Tweed Hadley & McCloy LLP  
1 Chase Manhattan Plaza  
New York, NY 10005-1413  
Phone: 212.530.5000; Fax 212.822.5844

ATTORNEYS FOR DEFENDANT  
FUJITSU NETWORK  
COMMUNICATIONS, INC.

/s/ Mark Dodd, with permission by  
Michael E. Jones

James P. Bradley  
Attorney-in-Charge  
Texas Bar No. 02826000  
Email: [jbradley@sidley.com](mailto:jbradley@sidley.com)  
Mark Dodd  
Texas Bar No. 24040815  
Email: [mdodd@sidley.com](mailto:mdodd@sidley.com)  
SIDLEY AUSTIN LLP  
717 N. Harwood, Suite 3400  
Dallas, Texas 75201

Tel: (214) 981-3306

Fax: (214) 981-3400

Richard F. O'Malley

Lisa A. Schneider

Robert D. Leighton

SIDLEY AUSTIN LLP

One South Dearborn

Chicago, IL 60603

Tel: 312-853-7000

Fax: 312-853-7036

ATTORNEYS FOR DEFENDANTS

TELLABS, INC., TELLABS

OPERATIONS INC., AND TELLABS

NORTH AMERICA, INC.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) this 19th day of October 2012. Any other counsel of record will be served by facsimile transmission and/or first class mail.

/s/ Michael E. Jones

Michael E. Jones